

Rory J. McEvoy

Partner

+1 212 912 2787

fax +1 212 308 4844

rmcevoy@edwardswildman.com

October 24, 2013

**VIA ECF**

Hon. Ramon E. Reyes, Jr.  
Unites States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Felix-Williams v. Long Island College Hospital  
Docket No. 13-cv-2772

Dear Judge Reyes:

On behalf of our client, Long Island College Hospital ("LICH"), I write to provide the Court with a proposed case management plan. My colleague Katherine Watson met and conferred with the Plaintiff on October 11<sup>th</sup> and October 16<sup>th</sup>. The parties have agreed on the enclosed discovery schedule. Per our conversation with the Court this morning, we have electronically signed the enclosed order on Ms. Felix-Williams' behalf with her consent and included a photograph of her signature on the order. The dates outlined in the proposed case management plan reflect our efforts to allow Ms. Felix-Williams ample time to consult the *pro se* office for assistance during the discovery process because she indicated to us that she has no prior litigation experience.

Respectfully submitted,



Rory J. McEvoy

Enclosure

cc: Ms. Lisa Felix-Williams (via email and regular mail)  
Pro Se Plaintiff  
37 Centre Mall, #6B  
Brooklyn, New York 11231

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

-----X  
**Lisa Felix-Williams,**  
Plaintiff,

**CASE MANAGEMENT PLAN**  
**13-CV-02772 (JBW)(RER)**

-against-

**Long Island College Hospital**  
Defendant.  
-----X

Upon consent of the parties, it is hereby ORDERED as follows:

1. Defendants shall answer or otherwise move with respect to the complaint by 10/8/13.
2. No additional parties may be joined after 11/22/13.
3. No amendment of the pleadings will be permitted after 11/22/13.
4. Date for completion of automatic disclosures required by Rule 26(a)(1) of the Federal Rules of Civil Procedure, if not yet made: 10/31/13.
5. The parties shall make required Rule 26(a)(2) disclosures with respect to:
  - (a) expert witnesses on or before 1/8/14.
  - (b) rebuttal expert witnesses on or before 1/15/14.
6. All discovery, including depositions of experts, shall be completed on or before 2/7/14 (Generally, this date must be no later than 6 months after the initial conference).
7. Pre-motion letters regarding proposed dispositive motions must be submitted within two (2) weeks following the close of all discovery.
8. Do the parties consent to trial before a magistrate judge pursuant to 28 U.S.C. § 636(c)? (Answer no if any party declines to consent without indicating which party has declined.)  
Yes \_\_\_\_\_ No X

If parties answer yes, then fill out the AO 85 (Rev. 01/09) Notice, Consent, and Reference of a Civil Action to a Magistrate Judge form. The form can be accessed at the following link: <http://www.uscourts.gov/uscourts/FormsAndFees/Forms/AO085.pdf>.

9. A Telephone Conference set for \_\_\_\_\_, to be initiated by  
Plaintiff or Defendant (Circle one).

\* (The Court will schedule the conference listed above.)

10. Status Conference will be held on \_\_\_\_\_.  
\* (The Court will schedule the conference listed above.)

11. A Final Pre-trial conference will be held on \_\_\_\_\_.  
\* (The Court will schedule the conference listed above.)

This scheduling order may be altered or amended upon a showing of good cause not foreseeable at the date hereof.

Dated: Brooklyn, New York  
\_\_\_\_\_, 2013

\_\_\_\_\_  
RAMON E. REYES, JR.  
UNITED STATES MAGISTRATE

JUDGE

/s/ Lisa Felix-Williams (see attached)

CONSENTED TO:

\_\_\_\_\_  
NAME Lisa Felix-Williams  
Attorney for Plaintiff Pro Se  
ADDRESS 37 Centre Mall, #608  
E-mail: Brooklyn, New York 11231  
Tel.:  
Fax:

\_\_\_\_\_  
NAME Rory J. McEvoy  
Attorney for Defendant  
ADDRESS 750 Lexington Avenue  
E-mail: New York, NY 10022  
Tel.: T: 212-308-4411  
Fax: F: 212-308-4844



9. A Telephone Conference set for \_\_\_\_\_, to be initiated by  
Plaintiff or Defendant (Circle one).  
\* (The Court will schedule the conference listed above.)

10. Status Conference will be held on \_\_\_\_\_  
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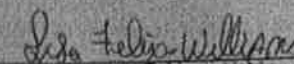
This scheduling order may be altered or amended upon a showing of good cause not  
foreseeable at the date hereof.

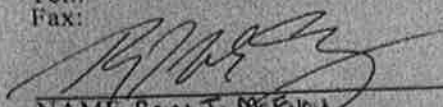
Dated: Brooklyn, New York  
\_\_\_\_\_, 2013

RAMON E. REYES, JR.  
UNITED STATES MAGISTRATE

JUDGE

CONSENTED TO:

  
NAME Lisa Felix-Williams  
Attorney for Plaintiff Pro Se  
ADDRESS 37 Centre Mall, #608  
E-mail: Brooklyn, New York 11231  
Tel.:  
Fax:

  
NAME Ron J. McEvoy  
Attorney for Defendant  
ADDRESS 750 Lexington Avenue  
E-mail: New York, NY 10022  
Tel.: T: 212-308-4411  
Fax: F: 212-308-4849